## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF WISCONSIN

In re:	)	
KIMBERLY N. MCGUINNESS-ROOK,	)	Case No. 18-26038-BEH
	)	Chapter 13
	)	
Debtor.	)	

## DEBTOR'S NOTICE OF TELEPHONE HEARING ON TRUSTEE'S MOTION TO DISMISS AND OBJECTION TO MOTION TO DISMISS

PLEASE TAKE NOTICE that a telephone hearing will be held before the Honorable Beth E. Hanan, United States Bankruptcy Judge, on January 8, 2019 at 9:00 am, to consider the Trustee's Motion to Dismiss this case. To appear by telephone, you must call the court conference line at 1-888-808-6929, and enter access code 9122579 before the scheduled hearing time. Please note that the court may already be in session, so please wait quietly on the telephone for your case to be called. The Debtor is welcome, but not required to participate in this hearing.

The debtor, Kimberly N. McGuinness-Rook, by her attorneys, Nickolai & Poletti, LLC, by William P. Nickolai, for her objection to the Motion to dismiss as filed by Trustee Scott Lieske on November 27, 2018, allege and states as follows:

- 1. Debtor asserts that regular plan payments shall resume forthwith.
- 2. Accordingly, it is the position of the debtor that the trustee's Motion to Dismiss should be denied.

Wherefore, the debtor hereby respectfully request that the Court deny the trustee's motion. Dated: December 18, 2018.

Nickolai & Poletti, LLC Attorneys for Debtors

/s/ William P. Nickolai By: William P. Nickolai

Drafted By: William P. Nickolai State Bar No. 1017534 Nickolai & Poletti, LLC

152 E. State Street Burlington, WI 53105 Telephone: (262) 757-8444 Facsimile: (262) 287-9725 Email: bill@nickolailaw.com